



DEPARTMENT of AGRICULTURE
STATE OF MISSOURI
JEFFERSON CITY

MICHAEL L. PARSON
GOVERNOR

*Serving, promoting and protecting the agricultural producers, processors
and consumers of Missouri's food, fuel and fiber products.*

CHRIS CHINN
DIRECTOR

February 21, 2019

Tawanda Maignan, Team Leader
Emergency Response Team
U.S. EPA Office of Pesticide Programs
Document Processing Desk (EMEX)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

Dear Ms. Maignan:

The Missouri Department of Agriculture requests a specific emergency exemption under the provisions of section 18 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended, for use of Sulfoxaflor, formulated as the product Transform WG, (EPA Reg. No. 62719-625), on sorghum to control sugarcane aphid (SA), *Melanaphis* sp., and incorporates by reference all information submitted in the previous application dated March 20, 2018. We are requesting an expiration date of November 30, 2019 for File Symbol #19MO- -.

This is the fifth year that the Missouri Department of Agriculture has requested this use. The Department asks that this specific exemption request be processed as eligible for a streamlined repeat request as allowed by 40 CFR166.20(b)(5).

Also in accordance with the regulations, the Missouri Department of Agriculture hereby certifies the following

1. ☒ The emergency condition(s) described in the previously submitted emergency exemption application continues to exist.
2. ☒ All information submitted in the previously submitted emergency exemption application is still accurate.
3. ☒ The proposed conditions of use are identical to the conditions of use EPA approved previously for emergency File Symbol #18MO02, dated: March 30, 2018.
4. ☒ There were no additional conditions or limitations on the eligibility for recertification identified in the previous notice of approval.
5. ☒ The applicant has not newly become aware of any alternative chemical or nonchemical practice that may offer a meaningful level of pest control.
6. ☒ A final or interim report is attached.

We hope this information is sufficient for the application process. If you have any questions regarding this specific exemption request, please contact Stephanie Deeken of the Department's Bureau of Pesticide Control at (573) 522-1637 or Stephanie.deeken@mda.mo.gov.

The use of this pesticide is of **extreme** importance to our sorghum producers. We respectfully request this application be given priority review.

Sincerely,



Dawn Wall
Program Administrator
Bureau of Pesticide Control



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Arlington, VA 22202

Dear Ms. Maignan:

In Accordance with 40 CFR 166.50, we are submitting a final report summarizing the results of treatment under the specific exemption 18MO02 granted March 30, 2018, for the use of Transform WG (*Suloxaflor*), EPA Reg. No. 62719-625 for control of the sugarcane aphid (SA), *Melanaphis sp.* in sorghum.

According to information received from Dow AgroSciences, approximately 838 lbs of Transform was used in Missouri in 2018 for the sugarcane aphid with approximately 13,407 acres treated. No adverse effects were reported and efficacy was reported to be very good under this specific exemption. No enforcement action was taken by Missouri Department of Agriculture under this specific exemption.

If you have any questions, please contact this office.

Sincerely,

Stephanie Deeken
Certification Program Coordinator
Bureau of Pesticide Control

C: Mr. Jamie Green, EPA Region VII
Mr. Shawn Hackett, EPA Region VII
Dr. Jamey Thomas, DowAgroSciences



Dow AgroSciences

Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Transform® WG

EPA Reg. No: 62719-625

For Control of Sugarcane Aphid (*Melanaphis sacchari*) in Sorghum

Section 18 Emergency Exemption

File symbol: XXXXXX

FOR DISTRIBUTION AND USE ONLY IN MISSOURI UNDER SECTION 18 EMERGENCY EXEMPTION

This Section 18 Emergency Exemption is effective XXXXXX and expires XXXXXX.

- This labeling must be in the possession of the user at the time of application.
- It is in violation of federal law to use this product in a manner inconsistent with its labeling.
- Read the label affixed to the container for Transform® WG insecticide before applying. Carefully follow all precautionary statements and applicable use directions.
- Any adverse effects resulting from the use of Transform WG under this emergency exemption must be immediately reported to the Missouri Department of Agriculture.

Environmental Hazards Statement: This product is highly toxic to bees exposed through contact during spraying and while spray droplets are still wet. This product may be toxic to bees exposed to treated foliage for up to 3 hours following application. Toxicity is reduced when spray droplets are dry. Risks to managed and native pollinators from contact with pesticide spray or residues can be minimized when applications are made before 7:00 a.m. or after 7:00 p.m. local time or when the temperature is below 55 degrees Fahrenheit (°F) at the site of application.

Directions for Use

Pests and Application Rates:

Pests	Transform WG (oz/acre)	Comments
Sugarcane aphid	0.75 – 1.5 (0.023 – 0.047 lb ai/acre)	Use a higher rate in the rate range for heavy pest populations.

Application Timing: Treat in accordance with local economic thresholds. Consult your Dow AgroSciences representative, cooperative extension service, certified crop advisor or state agricultural experiment station for any additional local use recommendations for your area.

Application Method: Control of sugarcane aphid may be contingent on thorough coverage to the crop. Use sufficient water to get full coverage of the canopy. It is recommended that a minimum of 5 gallons of water be applied by air.

Spray Drift Management: Applications are prohibited above wind speeds of 10 miles per hour (mph). Applications must be made with medium to coarse spray nozzles (i.e., with median droplet size of 341 µm or greater).

Restrictions:

- **Preharvest Interval:** Do not apply within 14 days of grain or straw harvest or within 7 days of grazing, or forage, fodder, or hay harvest.
- A restricted entry interval (REI) of 24 hours must be observed.
- Do not make more than two applications per acre per year.
- **Minimum Treatment Interval:** Do not make applications less than 14 days apart.
- Do not apply more than a total of 3.0 oz of Transform WG (0.09 lb ai of sulfoxaflor) per acre per year.
- Do not apply product ≤ 3 days pre-bloom or until after seed set.

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R396-229

Approved: ___/___/___

Replaces 396-197



Dow AgroSciences

Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46163

dowagro.com

February 7, 2019

Stephanie Deeken
Certification Program Coordinator
Bureau of Pesticide Control
Missouri Department of Agriculture
PO Box 630, Jefferson City, MO 65102

Re: Support letter for TransformTM WG Section 18 on sorghum

Dear Ms. Deeken,

Per your request, this letter is to confirm that Dow AgroSciences supports the pursuit of a Section 18 emergency exemption for Transform WG to control sugarcane aphid in sorghum in the state of Missouri. Transform WG has provided excellent efficacy against sugarcane aphid in previous use under Section 18 exemptions, with no negative impacts on non-target insects. It represents a new class of chemistry with a novel mode of action, and controls pests resistant to other classes of chemistry.

If you have questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Thomas".

Jamey Thomas, Ph.D.
US Regulatory Manager
Dow AgroSciences

cc: Tami Jones-Jefferson, DAS

TMTrademark of Dow AgroSciences LLC

February 15, 2019

To whom it may concern:

We request a section 18 emergency exemption for the use of sulfoxaflor (Transform WGTM, Dowdupont) to manage sugarcane aphid, *Melanaphis sacchari*, in Missouri sorghum. Sugarcane aphids is an invasive insect from Asia that was unintentionally introduced to the USA. Sugarcane aphid was first reported on sorghum in Texas in 2013 and has since spread to at least 17 states. This pest species is capable of explosive population growth, resulting in severe economic losses in sorghum. Populations can exceed 10,000 aphids per plant. Sugarcane aphids intensify water stress, induce chlorosis, reduce productivity and create sooty mold infestations resulting from honeydew. Some growers have experienced 100% yield losses.

Currently growers rely on Transform to manage this severe economic pest. Transform effectively manages sugarcane aphid, protecting sorghum yield and is less toxic to beneficial insect species compared with pyrethroids, organophosphates and neonicotinoids. No reports of negative interactions of Transform on pollinator species exist in Missouri. Without the use of Transform, the sorghum industry in Missouri is seriously threatened.

Sincerely,



Kevin B. Rice

Assistant Professor

Division of Plant Science